

**UNITED STATES DISTRICT COURT**  
for the

District of South Dakota  
Western Division

United States of America	)	
v.	)	
	)	Case No. 5:24-mj- <i>13</i>
Shalinee Vyas,	)	
	)	
<i>Defendant(s)</i>	)	

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about between the date(s) of September 1, 2023, and September 30, 2023, in the District of South Dakota and elsewhere, the defendant(s) violated:

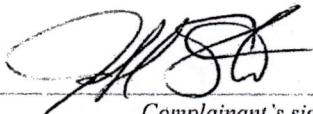
<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 1343 and 1349	Conspiracy to Commit Wire Fraud

This criminal complaint is based on these facts:

On or about the between September 1, 2023, and September 30, 2023, in the District of South Dakota and elsewhere, the defendant, Shalinee Vyas, knowingly and willfully conspired and agreed with others known and unknown to commit the offense of wire fraud, in violation of 18 U.S.C. § 1343 and 1349. The defendant, Shalinee Vyas, and others known and unknown willfully and unlawfully devised and intended to devise a scheme and artifice to defraud and to obtain money and property from others by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice and attempting to do so, unlawfully, willfully, and knowingly did cause to be transmitted by means of wire communications in interstate and foreign commerce writings, signs, signals and sounds, to wit, the defendant, Shalinee Vyas, sent electronic messages directing others known and unknown to locations in the District of South Dakota and elsewhere to obtain money and property from sources that they knew was being obtained under false and fraudulent pretenses and representations.

The object of the conspiracy was personal enrichment by obtaining fraudulent funds. The conspiracy was accomplished by participants in the conspiracy calling elderly individuals and, through various fraudulent pretenses and representations, causing elderly individuals to believe they had committed a crime and would be arrested if they did not pay over sums of either cash or gold. One such victim was S.K. who resided in the District of South Dakota between September 1, 2023, and September 30, 2023. Members of the conspiracy contacted S.K. and convinced S.K. that she had committed a crime and had to pay over money, including cash and gold to avoid being arrested. As a result of the false and fraudulent pretenses and representations, on or about September 19, 2023, S.K. withdrew approximately \$10,000 in cash from her bank account and mailed the cash to a location in New Jersey. On September 21, 2023, S.K. withdrew approximately \$100,000 in cash from her bank and, at the direction of members of the conspiracy, converted the cash to gold bullion, which a member of the conspiracy later picked up from S.K. on September 21, 2023. On September 25, 2023, law enforcement was made aware of the scheme to defraud S.K. and on September 26, 2023, arrested Abdul Waheed Mohammed as Mohammed attempted to pick up approximately \$95,000 in gold bullion from S.K. Through electronic communications, Shalinee Vyas had directed Mohammed to Rapid City in order to pick up the gold bullion from S.K. In addition to directing Mohammed to Rapid City, Shalinee Vyas had directed Mohammed to other locations, including Illinois and Indiana to pick up packages containing cash from individuals who had also been defrauded using a similar scheme.

Continued on the attached sheet.



Complainant's signature

Jeff Stotko, Special Agent,

Treasury Inspector General for Tax Administration

*Printed name and title*

Sworn to before me and:  signed in my presence.

submitted, attested to, and acknowledged by reliable electronic means.

Date: 11-4-24



Judge's signature

City and state: Rapid City, South Dakota

Daneta Wollmann, United States Magistrate Judge

*Printed name and title*